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6 Alan Richards, and the Proposed Class

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8 UNITED STATES DISTRICT COURT
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10 NORTHERN DISTRICT OF CALIFORNIA
11
12 OAKLAND DIVISION

12 In re VIOLIN MEMORY, INC.,
13 SECURITIES LITIGATION

Master File No.: 4:13-cv-05486-YGR

14 **STIPULATION AND ~~[PROPOSED]~~**
ORDER REGARDING HEARING
DATE

15 Judge: Hon. Yvonne Gonzalez Rogers
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STIPULATION AND ~~[PROPOSED]~~ ORDER
REGARDING HEARING DATE
CASE NO. 4:13-05486-YGR

1 This Stipulation is entered into by and among plaintiffs Ali Shehk and Alan Richards
2 (together, "Plaintiffs") and defendants Violin Memory, Inc., Donald G. Basile, Cory J. Sindelar,
3 Dixon R. Doll Jr., Howard A. Bain III, Larry J. Lang, Jeff J. Newman, Mark N. Rosenblatt, David
4 B. Walrod, J.P. Morgan Securities LLC, Deutsche Bank Securities Inc., Merrill Lynch, Pierce
5 Fenner & Smith Incorporated, Barclays Capital Inc., Robert W. Baird & Co. Incorporated, Pacific
6 Crest Securities, LLC, and EM Securities, LLC (collectively, "Defendants") through their
7 attorneys of record.

8 WHEREAS, on November 21, 2014, Plaintiffs filed the Amended Consolidated Class
9 Action Complaint (Doc. No. 90);

10 WHEREAS, pursuant to the Court's November 12, 2014 Order (Doc. No. 89), the motion
11 to dismiss hearing is currently scheduled for February 24, 2015;

12 WHEREAS, lead counsel for the Violin Memory Defendants, James N. Kramer, is
13 scheduled to be in New York on February 24, 2015 for another matter;

14 WHEREAS, the parties have agreed and stipulated to a new motion to dismiss hearing
15 date of March 24, 2015.

16 IT IS SO STIPULATED.
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1 Dated: December 19, 2014

MICHAEL D. TORPEY
JAMES N. KRAMER
CHRISTIN J. HILL
ALEXIS YEE-GARCIA
Orrick, Herrington & Sutcliffe LLP

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4
5 /s/ Christin J. Hill

6 Christin J. Hill
7 Attorneys for Defendants Violin Memory Inc., Cory
8 Joseph Sindelar, Donald Basile, Dixon Raymond
9 Doll Jr., Jeffrey J. Newman, Howard Allen Bain III,
10 Lawrence J. Lang, David Bradley Walrod, and Mark
11 Neal Rosenblatt

9 Dated: December 19, 2014

PATRICK E. GIBBS
JULIAN W. PARK
Latham & Watkins LLP

11
12 /s/ Patrick E. Gibbs

13 PATRICK E. GIBBS
14 Attorneys for Defendants J.P. Morgan Securities
15 LLC, Deutsche Bank Securities Inc., Merrill Lynch,
16 Barclays Capital Inc., Robert W. Baird & Co. Inc.,
17 Pacific Crest Securities LLC, and
18 EM Securities LLC

16 I, Christin J. Hill, am the ECF user whose ID and password are being used to file this
17 Stipulation and [Proposed] Scheduling Order. In compliance with General Order 45, X.B., I
18 hereby attest that Patrick E. Gibbs has concurred in this filing.

18 Dated: December 19, 2014

19 LAURENCE D. KING
20 JEFFREY P. CAMPISI
21 MARIO M. CHOI
22 Kaplan Fox & Kilsheimer LLP

23 /s/ Jeffrey P. Campisi

24 JEFFREY P. CAMPISI
25 Attorneys for Lead Plaintiffs

26 I, Christin J. Hill, am the ECF user whose ID and password are being used to file this
27 Stipulation and [Proposed] Scheduling Order. In compliance with General Order 45, X.B., I
28 hereby attest that Jeffrey P. Campisi has concurred in this filing.

1 Dated: December 19, 2014

NICHOLAS I. PORRITT
ADAM M. APTON
Levi & Korsinsky LLP

2
3
4 /s/ Adam M. Apton
ADAM M. APTON
Attorneys for Lead Plaintiffs

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7 *I, Christin J. Hill, am the ECF user whose ID and password are being used to file this*
8 *Stipulation and [Proposed] Scheduling Order. In compliance with General Order 45, X.B., I*
9 *hereby attest that Adam M. Apton has concurred in this filing.*
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~~[PROPOSED]~~ ORDER

Pursuant to the Stipulation reached by the parties, and good cause appearing, the Court
ORDERS that the hearing on Defendants' motion to dismiss the amended consolidated complaint
shall be moved to March 24, 2015.

Dated: December 22, 2014



HON. YVONNE GONZALEZ ROGERS
DISTRICT JUDGE